I oppose loosening the rules designed to promote and protect diversity of media ownership. These rules were adopted to ensure that the public would receive a diverse range of viewpoints from the media, and not simply the opinions of a handful of media conglomerates.

Specifically, I urge the Commission to take the following actions:

1) Preserve and enforce the "Newspaper-Broadcast Ownership" Rule. Locally based broadcast stations and newspapers remain the public's primary sources of information and opinion. Any consolidated ownership of these vital local media measurably reduces the information and choices available to the public.

2) Preserve (or reformulate) the National Cable Ownership Limit, and begin enforcing the current ownership cap of 30 percent of total US households (or a lower cap).

3) Renew and enforce the Cable Program Access Rules. These rules are essential to prevent monopoly cable operators from denying the public access to a diversity of programming.

4) Preserve and enforce the Local Radio Ownership Rules (of 8 or fewer radio stations per local market, with caps pro-rated by market size).

5) Preserve and enforce the Local Television Ownership Rules ("Duopoly Rules"). Better still, reinstate the pre-1999 rule that prohibited a single owner from possessing more than one local television station.

6) Preserve and enforce the Dual Networks Rule, prohibiting major television networks from merging. Better still, reinstate the pre-2001 rule that prohibited mergers between major and "emerging" television networks; and reinstate the pre-1996 rule that prohibited the major networks from creating new networks.

7) Preserve and enforce the Local Radio-Television Cross Ownership Rule.

8) Reformulate and enforce the Local Cable-Television Ownership Rule, prohibiting a single owner from possessing both a cable system and a TV station in the same area.

9) Reformulate and enforce the National Television Ownership Rule, prohibiting a single entity from owning stations that reach more than 35 percent of the total audience.

The stagnation or collapse of conglomerates like AOL/Time-Warner, MCI/Worldcom and Global Crossing, and the steady increase in subscription fees for cable TV and broadband access amid dwindling competition, demonstrate the negative impacts of past deregulatory initiatives (including the 1996 Telecommunications Act) for all stakeholders. Government's failure to sustain and enforce strong ownership limits leaves consumers stuck with fewer voices, fewer choices, and higher costs. It leaves entrepreneurs and innovators frozen out of prematurely consolidated markets. And it leaves shareholders and lenders vulnerable to artificial booms and punishing collapses in the value of their communications-industry securities.

The Commission can best promote the public interest, for all of these stakeholders, by returning to its traditional role of promoting diversified media ownership, healthy market competition, and moderate and sustainable growth for individual owners.

As the irrationally exuberant predictions of media "convergence" evaporate, it is clear to all that the main sources of information and opinion for most of the public remain broadcast outlets and local newspapers. To preserve the public interest in sustaining a vigorous democracy and a well-informed electorate, it is vital that the Commission aggressively promote highly diversified ownership of these vital media outlets.

I make the above recommendations based on personal experience. My city has some 100 channels available on its cable-TV service (including, thanks to vocal community advocacy, five PBS stations and C-SPAN-1 and -2). We are a highly "wired" community that makes ample use of access to the World Wide Web. Yet our community has been immeasurably damaged by the recent collapse of a "old medium," our city's former daily newspaper. The public has lost a vital outlet for the reporting, discussion, and debate of public affairs; and local cultural institutions and businesses find it harder to communicate and connect with the public.

By the way, the local cable-TV service that I just mentioned remains a solid monopoly. In the absence of any meaningful regulation of rates -- or promotion of competition -- by either the FCC or the Congress, the cost of a typical programming selection has steadily increased by an unconscionable 10% to 20% per year for the past decade. Furthermore, the owner (AT&T "Broadband") has exercised its prerogative to make premium channels outrageously expensive by demanding that subscribers purchase and/or lease digital converters in order to receive these channels.

I urge the Commission to genuinely serve the public interest by preserving and enforcing strong market-share limits and diversified ownership of media outlets.

I respectfully thank you for considering these comments.